



## She Echoes safeguarding policy - England

**Publication date: 09/03/2026**

**Annual review date: 28/02/2027**

**Reviewed & Ratified By: Board of Directors**

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## 1. Introduction

She Echoes CIC is committed to creating a strong, trauma - informed culture of safeguarding specifically for women and girls. We believe safeguarding is everyone's responsibility and foster an environment where all staff, facilitators, volunteers and partners embrace the principle that "*it could happen here*".

We are dedicated to building a culture of vigilance, transparency and accountability. Everyone who works with, supports, or visits She Echoes shares a collective duty to protect the welfare and wellbeing of the women and young girls we serve. We actively encourage concerns to be raised without fear, ensuring that all voices are heard and taken seriously.

She Echoes exists to provide safe, empowering creative spaces for girls and young women - particularly those aged 11-16 and 17 -25+, to explore music, media, and creative expression. Under no circumstances will any staff member, volunteer, or partner engage in behaviour that causes physical, emotional, psychological, or sexual harm. We operate a zero- tolerance approach to abuse, exploitation, grooming, harassment, or any form of violence against women and girls (VAWG).

We are committed to acting in the best interests of every young person and woman who engages with our programmes. This includes recognising the additional risks faced by girls and young women both offline and online and ensuring they are supported to identify unsafe situations, understand consent and boundaries, and access help when needed.

In line with statutory safeguarding guidance, including *Working Together to Safeguard Children*, and best practice frameworks relating to contextual safeguarding and VAWG, we consider the wider social environments that impact young women's safety. We recognise risks linked to exploitation, peer - on peer harm, online abuse, coercive control, and community violence, and we take proactive steps to mitigate these risks.

She Echoes is committed to:

- Creating safe, inclusive and girl centred creative spaces
- Promoting dignity, equality and respect at all times
- Empowering young women with knowledge, confidence and voice
- Providing clear reporting pathways and responsive safeguarding procedures
- Working collaboratively with families, schools, local authorities and specialist services where appropriate

Our safeguarding approach is rooted in empowerment, prevention, and protection. We believe that when women and girls feel safe, heard and valued, they thrive creatively, personally and professionally.

At She Echoes, safeguarding is not just a policy, it is the foundation of everything we build.

## **2. Equality ,Diversity & Inclusion Statement**

She Echoes CIC is committed to advancing equality, celebrating diversity, and creating inclusive creative spaces specifically for women and girls. Our mission is rooted in empowerment, representation, and the removal of systemic barriers that disproportionately affect young women, particularly those from underrepresented and marginalised communities.

We are committed to ensuring that all participants, staff, volunteers, freelancers, partners and applicants are treated with dignity, fairness and respect. No individual will be discriminated against, directly or indirectly, on the basis of any protected characteristic under the Equality Act 2010, including:

- Age
- Disability
- Marriage or civil partnership
- Pregnancy or maternity
- Race (including colour, nationality and ethnic or national origin)
- Sex
- Sexual orientation

As a female led organisation, She Echoes exists to create safe and empowering opportunities for women and girls in creative and media industries where they are historically underrepresented. Our targeted provision for women and girls is a proportionate and lawful approach to addressing gender inequality and advancing equal opportunity.

We are particularly committed to;

- Supporting girls and young women who are Black, Asian and from minoritised ethnic backgrounds
- Ensuring inclusion for Neurodivergent young women and those with Special Educational Needs and Disabilities (SEND)
- Creating trauma informed spaces for young women affected by exploitation, violence, exclusion or systemic disadvantage
- Removing financial barriers to participation wherever possible
- Promoting positive female role models and leadership pathways

We operate a zero tolerance approach to discrimination, harassment, bullying, victimisation or hate based behaviour. Any concerns will be taken seriously and addressed promptly in line with our safeguarding and disciplinary procedures.

At She Echoes, equality is not just about compliance, it is about culture. We actively challenge bias, champion representation, and ensure that every girl and woman who enters our space feels seen, valued, respected and empowered to thrive.

### 3. Definitions

In line with statutory guidance including *Working Together to Safeguard Children*, the **Children Act 1989 & 2004**, the **Care Act 2014**, the **Equality Act 2010**, and the **Domestic Abuse Act 2021**, She Echoes recognises that safeguarding is everybody's responsibility.

We define safeguarding as:

- Protecting children and young women from maltreatment
- Preventing impairment of mental and physical health or development
- Ensuring individuals grow up and participate in environments that are safe and effective
- Taking action to enable the best outcomes
- Protecting women and girls from violence, abuse, exploitation and discrimination

#### Definition of Terms

<b>Term</b>	<b>Definition</b>
<b>Children &amp; Young People</b>	Anyone under the age of 18 years.
<b>Young Women (18 -25+)</b>	Women aged 18 and over participating in She Echoes programme. While legally adults, we recognise heightened risks linked to exploitation, domestic abuse, coercive control, sexual violence and gender based harm.
<b>Adults at Risk</b>	Anyone aged 18 or over who; has care and support needs, and is or at risk of abuse or neglect, and; is unable to protect themselves due to those needs. This may include individuals with SEND, neurodivergence, mental ill health, disabilities, or those affected by domestic or sexual violence.
<b>Violence Against Women and Girls (VAWG)</b>	Acts of violence or abuse that disproportionately affect women and girls, including, domestic violence, exploitation, coercive control, harassment, FGM, Forced marriage and

	online abuse.
<b>Staff, Facilitators &amp; Volunteers</b>	Anyone working for or on behalf of She Echoes CIC, whether paid, contracted, freelance, trustee or voluntary.
<b>Service Users</b>	Any girl or woman engaging in She Echoes programmes, events, mentoring, workshops or creative activities.

#### 4. Key Contacts

<b>Name</b>	<b>Role</b>	<b>Area of Operation</b>	<b>Contact Details</b>
Adina Thompson	(DSL) Designated Safeguarding Lead	CEO of She Echoes CIC	<a href="mailto:Adina.thompson@sheechoes.co.uk">Adina.thompson@sheechoes.co.uk</a>
Meena Joseph	(DSL) Deputy	Director of Partnerships & Engagement	<a href="mailto:Meena.joseph@sheechoes.co.uk">Meena.joseph@sheechoes.co.uk</a>
Nigel Rollock	Safeguarding	Director of Governance & Safeguarding	<a href="mailto:Nigel.Rollock@sheechoes.co.uk">Nigel.Rollock@sheechoes.co.uk</a>
Eva Simcock	Local Authority Safeguarding lead (LADO)	Southwark Council	<a href="mailto:Eva.simcock@southwark.gov.uk">Eva.simcock@southwark.gov.uk</a> 02075250689

We are part of Southwark Council local authority. We follow Southwark Council multi-agency safeguarding arrangements put in place by the safeguarding partners. Further details can be found here.

<https://www.southwark.gov.uk/children-and-families/child-protection-and-safeguarding/professionals-working-children/child-3>

## **5. Roles and Responsibilities**

### **5.1 Designated Safeguarding Lead (DSL) and Deputies**

The **Designated Safeguarding Lead (DSL)** for She Echoes CIC holds primary responsibility for safeguarding and promoting the welfare of all its participants, particularly **young women and girls engaged in She Echoes programmes**.

The DSL will be supported by any appointed **Deputy Designated Safeguarding Leads**.

The DSL will:

- Take overall responsibility for safeguarding across all She Echoes activities, programmes, workshops, and events.
- Be available during operating hours for staff, volunteers, participants, parents, carers, and partners to discuss safeguarding concerns.
- Ensure they are familiar with **local safeguarding thresholds and procedures**, including guidance from the local authority and safeguarding partnerships.
- Lead on safeguarding referrals where necessary, including:
  - Children's social care
  - Early help services
  - Police where a crime may have occurred
  - The **channel programme** where there are concerns around radicalisation
- Referrals relating to staff or volunteer conduct where DBS or regulatory reporting may be required.
- Ensure safeguarding concerns are recorded, managed and reported in accordance with **legal and statutory safeguarding requirements**.
- Understand and promote the use of **Early Help**, identify young people and families who may benefit from additional support to all She Echoes staff, facilitators, volunteers and partners.
- Act as a main point of contact between She Echoes and **external safeguarding agencies**, including local authorities, safeguarding boards, youth services, and specialist organisations supporting women and girls.

- Ensure safeguarding practices within She Echoes reflect a **trauma-informed, gender responsive and safe space approach**, recognising the additional risks faced by women and girls including exploitation, abuse, coercion and violence against women and girls (VAWG).

## **5.2 Directors and Safeguarding Governance**

As a Community Interest Company, **She Echoes CIC does not have trustees. Safeguarding oversight sits with the organisation's Directors.**

The Directors are responsible for ensuring safeguarding is embedded across all activities and that appropriate systems are in place to protect the welfare of children, young people and the vulnerable adults engaged in She Echoes programmes.

Directors will:

- **Review and approve this safeguarding policy annually**, ensuring it remains compliant with UK safeguarding legislation and best practice.
- **Hold the organisation accountable for safeguarding implementation**, ensuring all staff, volunteers, facilitators, and partners adhere to safeguarding procedures.
- **Ensure a designated safeguarding lead (DSL) is appointed** within the organisation to manage safeguarding concerns and reporting processes.
- **Ensure all staff and volunteers receive safeguarding training**, including safeguarding awareness during induction and ongoing training where appropriate.
- **Ensure safer recruitment practices are followed**, including DBS checks where required for individuals working with children and young people.
- **Ensure safeguarding incidents are recorded, reported, and responded to appropriately**, including referral to relevant safeguarding authorities where necessary.
- **Ensure safeguarding risk assessments are undertaken** for all programmes, workshops, and events delivered by She Echoes.

- **Ensure compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)** when handling personal and safeguarding information.
- **Promote a culture of safety, inclusion, and accountability,** particularly in relation to supporting women and girls within creative and community environments.

The Directors maintain overall responsibility for safeguarding governance, while day to day safeguarding management may be delegated to the **Designated Safeguarding Lead (DSL)**.

**All staff, Volunteers and Employees Must:**

- Receive appropriate safeguarding and child protection training and refreshers including online safety.
- Receive safeguarding updates regularly through email and regular staff meetings at least quarterly that provides the relevant skills and knowledge to safeguard children effectively.
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) or to access Early Help services.
- Know what to do if a child tells them they are being abused, exploited, or neglected and to maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Understand the process for making referrals locally, what the routes are after referral and the assessment processes and have awareness of the NSPCC helpline.
- Know that if a child is suffering (or is likely to suffer) immediate harm, it is important to make a referral to children's social care and where relevant contact the police and your local authority designated officer at once.

- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.
- Know the indicators of abuse and neglect and the specific safeguarding issues that can put children at risk of harm and undertake appropriate training.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families e.g. sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Have a responsibility to highlight any concerns or risks to the safeguarding and protection of vulnerable adults.
- Know how to report concerns about safeguarding practices within the organisation via whistleblowing procedures or other means.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including volunteers and contractors) harming or posing a risk of harm to children or vulnerable adults.
- Attend and engage with induction training, including reading and understanding our: safeguarding policy , the staff/volunteer behaviour policy/code of conduct

## **6. Responding to Safeguarding Concerns and Disclosures**

When staff, volunteers, facilitators, mentors, or visitors within She Echoes CIC have a safeguarding concern regarding a participant, they must immediately report the concern to the Designated Safeguarding Lead (DSL) or Deputy DSL via phone, email, or in person.

All staff and volunteers must understand how to respond if a woman, girl or young person discloses abuse, exploitation, neglect, coercion, harassment, or

violence, and must maintain an appropriate level of confidentiality while prioritising the individual's safety.

### **When Responding to a Safeguarding Disclosure, Staff and Volunteers**

#### **Must:**

- **Listen Carefully and Calmly**, allowing the individual to speak freely without interruption.
- **Take all disclosures seriously**, particularly where women and girls may be experiencing abuse, exploitation, harassment, coercion, or violence.
- **Avoid asking leading or investigative questions** and only clarify what is necessary to understand the concern.
- **Never confront or contact the alleged abuser.**
- **Make written notes** of what has been said as soon as possible after the disclosure, using the individual's own words where possible.
- **Reassure the individual** that they have been heard and that they are not at fault for what has happened.
- Explain clearly what will happen next, including that the information will be shared with safeguarding professionals in order to keep them safe.
- **Report the concern immediately to the Designated Safeguarding Lead (DSL)** using the organisation's safeguarding reporting procedure.
- **Do not attempt to investigate the situation yourself.** Safeguarding investigations must only be carried out by the appropriate authorities.
- **Recognise that women and girls may not always feel ready or able to disclose abuse**, particularly in cases involving coercive control, exploitation, grooming, or gender-based violence. Staff should remain alert to signs of harm and discuss concerns with the DSL where appropriate.

## 7. Recording Safeguarding Concerns

If a staff member or volunteer becomes concerned through:

- A disclosure
- Behavioural changes
- Signs of abuse or neglect
- Conversations suggesting harm or exploitation

They must **record the concern in writing as soon as possible** and submit it to the **Designated Safeguarding Lead (DSL)**.

If the individual reporting the concern is unsure whether the issue constitutes a safeguarding matter, they must still **raise the concern with the DSL for professional guidance**.

All safeguarding records will be **stored securely and confidentially in line with the Data Protection Act 2018 and UK GDPR**.

She Echoes recognises the importance of effective record keeping and follow the following principles to support this:

- Maintain records of contact with child/ young person and their family/ carer outside of any planned and expected interaction,
- Records should be objective and distinguish between fact and opinion,
- Personal information, other than the individual's name, should be kept separate from information about other people,
- Records should clearly include the full name of the person who has reported the concern and the time and date this was logged, they must be recorded first-hand,
- Records should be created in a timely manner
- Records should be kept securely and only the DSL and relevant senior colleagues should have access to safeguarding records,
- The recording of information and the reasons for this should be shared with service users (if age appropriate) or their parents or carers where to do so would not increase a risk of harm,
- Records are retained in line with the organisation's retention schedule, which is informed by national guidance,

- Where referrals are made to external agencies a written record of this is retained, where referrals are made via the telephone this is confirmed in writing within 48 hours.

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children or vulnerable adults whether this is when problems are first emerging, or where an individual is already known to the local authority children's social care.

We have due regard to the relevant data protection principles, understanding that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At She Echoes, we understand that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

## **8. Site Safety**

All She Echoes staff, facilitators, volunteers, and partners share the responsibility to ensure that all activity spaces are safe, secure, and welcoming environments for women and girls participating in our programmes. Everyone involved in delivery must remain vigilant and report any concerns regarding safety, wellbeing or safeguarding immediately. She Echoes operates a monitored entry approach to all sessions where reasonably possible. The identity of all visitors, facilitators, volunteers and external partners attending activity sites will be verified before access is granted. Unauthorised individuals will not be permitted to enter programme spaces.

She Echoes maintains a **zero tolerance approach to behaviour that compromises the safety, dignity, or wellbeing of participants**, particularly women and girls. This includes any behaviour that is intimidating, aggressive, discriminatory, abusive, or that causes a young person or adult to feel unsafe.

Where such behaviour occurs, She Echoes reserves the right to:

- Ask the individuals to leave the premises immediately
- Refuse future access to activities or programme spaces

- Escalate concerns to safeguarding leads or venue management
- Seek guidance from relevant local safeguarding partners where appropriate

All sessions are delivered in line with She Echoes' safeguarding, health and safety, and risk assessments procedures. These measures are designed to ensure that all participants, particularly young women and girls aged 11-16 and 17-25+ can engage in creative expression, music, media and mentoring activities in a supportive and protected environment. For further information about our Health and Safety procedures and risk assessments please refer to <https://www.sheechoes.co.uk>

## **9. Whistleblowing and Complaints**

At She Echoes, we recognise that poor practice, unsafe behaviour, or failure in safeguarding procedures can place children, young people and adults at risk. We are committed to maintaining a culture of transparency, accountability, and safety where concerns can be raised without fear of retaliation.

All staff members, facilitators, volunteers, partners, and contractors have a responsibility to report any concerns about unsafe practice, misconduct, or failures in safeguarding procedures within the organisation. Where possible, concerns should be first raised with She Echoes safeguarding lead or a senior member of the organisation so that the matter can be addressed promptly and appropriately. If an individual feels unable to raise the concern internally, or believes that their concern has not been addressed appropriately, they may seek advice or report concerns through external whistleblowing channels.

External sources of advice include:

- The UK Government guidance on whistleblowing, which provides information on how to report concerns about wrongdoing or unsafe practice
- The NSPCC Whistleblowing Advice Line, which provides free advice and support to professionals who have concerns about how child protection issues are being handled within their organisation.

The NSPCC Whistleblowing Advice Line can be contacted on :

0800 028 0285

The line is available:

- Monday to Friday : 08:00 - 20:00
- Weekends: 09:00 - 18:00

Email : [Help@nspcc.org.uk](mailto:Help@nspcc.org.uk)

Participants, parents, carers and community members may also raise concerns or complaints regarding She Echoes activities, conduct, or safeguarding practice. These concerns will be taken seriously and handled in line with the She Echoe's safeguarding and complaints procedures.

She Echoes is committed to ensuring that all concerns are treated confidentially, investigated appropriately, and used to improve safeguarding practices and the safety of our programmes for women and girls.

### **8. Individuals with Special Educational Needs and Disabilities**

At She Echoes, we are aware of our responsibilities under the Equalities Act 2020 and abide by this legislation. We recognise that young people and vulnerable adults with social workers may potentially be at greater risk of harm and need further support. Individuals may need this support due to abuse, neglect, exploitation or complex family circumstances. Staff are aware that these individuals may face additional barriers. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place. Service users with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their disability without further exploration
- Being more prone to peer group isolation than others
- The potential for those with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.
- Cognitive understanding- being able to understand the difference between fact and fiction in online content and then repeating the content/ behaviours within the organisation or the consequences of doing so.

At She Echoes we identify individuals who may be more at risk of harm and take action to ensure their safety.

## **9. Online Safety**

She Echoes recognises that the use of digital technology, social media, and online platforms plays an important role in creative development, communication, and learning within our programmes. As a creative organisation working in music, media and digital storytelling, we also recognise that online environments can present safeguarding risks for children, young people and vulnerable adults.

She Echoes is committed to promoting the safe and responsible use of digital technology and ensuring that all participants, particularly girls and young women aged 11-16 and 17-25+ are protected from harmful or inappropriate online experiences.

To support online safety, She Echoes will:

- Implement clear procedures for the safe use of online platforms, digital tools, and social media during programme activities.
- Provide guidance and education to participants, staff, and volunteers on responsible and safe online behaviour.
- Establish clear expectations for appropriate use of mobile phones, recording devices, and social media during sessions and events.
- Ensure that images, recordings, and digital content created during sessions are used responsibly and only with appropriate consent.
- Monitor and manage She Echoe's digital spaces, including online workshops, messaging platforms, and social media channels, to ensure they remain safe and respectful environments.

Our approach to online safety recognises four key areas of risk:

### **Content**

Participants may be exposed to harmful, illegal, or inappropriate material online, including violent content, misogynistic, or discriminatory material, explicit imagery, or content promoting self-harm or extremism.

### **Contact**

Young people may experience harmful interactions online, including grooming, exploitation, harassment, bullying, or inappropriate contact from individuals posing as peers or industry professionals.

### **Conduct**

Online behaviour by individuals may increase risk, such as sharing personal information, engaging in cyberbullying, sending or receiving explicit images, or participating in harmful online trends.

### **Commercial Risks**

Participants may be exposed to financial scams, misleading advertising, inappropriate commercial offers, or exploitation within online creative and media spaces.

She Echoes staff and facilitators will actively promote digital awareness, media literacy, and respectful online engagement as part of our programmes. Any online safeguarding concerns will be recorded and managed in line with the organisation's safeguarding procedures and where necessary, escalated to appropriate safeguarding authorities.

She Echoes is committed to creating Safe digital and Physical environments where women and girls can express themselves creatively while being protected from online harm.

### **12. Child on Child Abuse**

She Echoes is committed to providing a safe, respectful, and empowering environment for all participants. We recognise that all children and young people have the right to feel safe, valued, and protected from harm while participating in our programmes and activities.

Child - on child abuse (sometimes referred to as peer-on-peer abuse) occurs when a child or young person causes harm to another child or young person. She Echoes recognises that this type of abuse can occur in any setting and may take place both in person and online.

While She Echoes programmes are designed to promote collaboration, creativity, and positive peer relationships, we acknowledge that harmful behaviour between young

people can still occur. For this reason, She Echoes takes a zero- tolerance approach to abuse behaviour and will respond promptly to any concerns to ensure the safety and wellbeing of all participants.

Child on child abuse may include, but is not limited to:

- Bullying, including cyberbullying, discriminatory bullying, or harassment
- Verbal abuse, intimidation, or harmful language directed at another participant
- Physical harm such as hitting, pushing, kicking, or other forms of physical aggression
- Sexual harassment or unwanted sexual comments, gestures, or behaviour
- Sexual violence or coercion, including pressuring someone into sexual activity
- Sharing or threatening to share explicit or private images without consent (sometimes referred to as youth produced sexual imagery)
- Online harassment or exploitation through social media or digital platforms
- Initiation type behaviour, humiliation, or behaviour intended to shame or isolate others

She Echoes will **never dismiss abusive behaviour as “banter,” “just having a laugh,” or a normal part of growing up.** All concerns will be taken seriously and addressed in line with She Echoes safeguarding procedures.

Where incidents occur, She Echoes staff and facilitators will:

- Ensure the immediate safety and wellbeing of those involved
- Record and report concerns in line with safeguarding procedures
- Take appropriate action to address behaviour and support those affected
- Seek guidance from safeguarding partners or relevant authorities where necessary

She Echoes is committed to fostering a culture of respect, inclusion, and accountability, where young women and girls feel safe to express themselves creatively and confidently without fear of bullying, harassment, or abuse.

### **Appendix 1: Types of Abuse and Safeguarding Concerns**

She Echoes recognises that safeguarding concerns can arise in many forms. Abuse may occur within a young girl's home, within the community, online, or within peer

relationships. Abuse can be carried out by adults or by other children and young people.

Staff, volunteers, and facilitators at She Echoes should remain vigilant to signs of abuse and report any concerns in accordance with the organisation's safeguarding procedures.

The main categories of abuse are outlined below.

### **Physical Abuse**

Physical abuse occurs when a child or young person is deliberately hurt or injured.

This may include:

- Hitting, shaking, pushing, or kicking
- Burning or Scalding
- Poisoning
- Suffocation or drowning
- Fabricating or Inducing illness

Signs may include unexplained injuries, repeated injuries, fear of physical contact, or changes in behavior.

### **Emotional Abuse**

Emotional abuse is the persistent emotional mistreatment of a child that impacts their emotional development and wellbeing. This may include:

- Humiliation, intimidation, or constant criticism
- Bullying or rejection
- Threats, manipulation, or controlling behaviour
- Exposure to domestic abuse
- Preventing a child from expressing themselves

Signs may include withdrawal, low confidence, anxiety, extreme behaviour, or developmental delays.

### **Sexual Abuse**

Sexual abuse occurs when a child or young person is forced or persuaded to take part in sexual activities. This may happen in person or online.

This can include:

- Sexual assault or unwanted touching
- Forcing or pressuring a child into sexual activity
- Grooming for sexual purposes
- Exploitation through prostitution or trafficking
- Producing, sharing, or viewing sexual images of children

Sexual abuse can be committed by adults or by other young people.

### **Neglect**

Neglect occurs when a child's basic physical and emotional needs are not met. This may include:

- Lack of adequate food, clothing, or shelter
- Failure to provide medical care
- Lack of supervision or protection from harm
- Emotional neglect or lack of affection
- Exposure to unsafe environments

Neglect may lead to poor health, poor hygiene, developmental delays, or ongoing emotional difficulties.

### **Child Sexual Exploitation (CSE)**

Child Sexual Exploitation is a form of sexual abuse where a child or young person is manipulated, coerced, or forced into sexual activity in exchange for something such as:

- Money
- Gifts
- Status or attention
- Drugs or alcohol
- Accommodation

This exploitation may occur both offline and online, including through social media.

### **Child Criminal Exploitation (CCE)**

Child criminal exploitation occurs when a child is manipulated or coerced into criminal activity. This may include:

- Drug distribution (such as county lines activity)
- Theft or shoplifting
- Carrying weapons or drugs
- Financial exploitation

Young people may be groomed or threatened into participating in these activities.

### **Bullying and Cyberbullying**

Bullying can involve repeated harmful behaviour intended to intimidate or harm another person. This may include:

- Verbal abuse or name calling
- Social exclusion
- Physical intimidation
- Online harassment through social media, messaging platforms, or digital content

Cyberbullying can occur at any time and may involve sharing harmful or embarrassing content.

### **Online Abuse**

Online abuse refers to abuse that occurs through digital platforms such as social media, messaging apps, gaming platforms, or online communities.

This may include:

- Grooming
- Coercion or manipulation
- Harassment or bullying
- Sharing private or explicit images
- Exposure to harmful or illegal content

## **Harmful Sexual Behaviour**

Harmful sexual behaviour refers to sexual actions or behaviours that are developmentally inappropriate, abusive, or harmful to others. This may include:

- Sexual harassment or unwanted sexual comments
- Pressuring someone into sexual activity
- Sharing sexual images without consent
- Sexual violence or coercion

## **Domestic Abuse**

Domestic abuse occurs when a child witnesses or is exposed to abuse within their household. This can include physical, emotional, financial, or coercive control between adults in the home.

Exposure to domestic abuse can significantly impact a child's emotional wellbeing and safety.

## **Female-Specific Safeguarding Concerns**

As an organisation supporting women and girls, She Echoes recognises safeguarding risks that disproportionately affect girls and young women, including:

- Sexual harassment and gender-based violence
- Grooming and exploitation
- Coercive or controlling relationships
- Online harassment and misogynistic abuse
- Image-based abuse or pressure to share explicit images

## **Honour Based Abuse**

'Honour-based' abuse (HBA): Encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

## **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## **Female Genital Mutilation (FGM):**

covers all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see

visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police. The duty does not apply in relation to at risk or suspected cases-these should be discussed with the DSL, in line with our referral process. Potential risk factors may include:

- A female child is born to a woman who has undergone FGM
- A female child has an older sibling or cousin who has undergone FGM
- A woman/family believe FGM is integral to cultural or religious identity
- A parent or family member expresses concern that FGM may be carried out on the girl
- A girl talks about FGM in conversation, for example, a girl may tell other children about it
- Being taken on a long holiday to country where FGM is prevalent

## **Radicalisation**

We recognise that children and adults are vulnerable to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Our organisation adheres to the Prevent duty and we have "due regard to the need to prevent people from being drawn into terrorism".

We build individuals' resilience to radicalisation by providing a safe environment for debating controversial issues, promoting fundamental British values. Staff should be alert to changes in behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying those who might be susceptible to radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

All our staff receive training on the Prevent duty via

<https://www.gov.uk/guidance/prevent-duty-training>

If the organisation needs to make a Prevent referral, we following guidance via

<https://www.gov.uk/guidance/making-a-referral-to-prevent>

The following roles in the organisation have completed training in how to make a Prevent referral: DSL As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, are suitable and appropriately supervised. In England, the Prevent duty complements organisations' other responsibilities for ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include following guidance set out within;

<https://www.gov.uk/government/publications/prevent-duty-guidance>

## **Mental health**

All staff at She Echoes are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff have a mental health concern about an individual that is also a safeguarding concern, they should contact the DSL or a deputy DSL and report and record their concerns in line with this policy. She Echoes is committed to creating safe spaces where girls and young women can express themselves creatively without fear of harassment, exploitation, or discrimination.

## **Appendix 2 : Safer Recruitment**

New staff Relevant staff have completed safer recruitment training. When appointing new staff, we will:

- Verify a candidate's identity, including checking the name on a birth certificate where this is available.
- Provide clear person specifications and role descriptions for all posts.
- Advertise all posts with a clear safeguarding or child protection statement
- Provide an information pack for people interested in each post including a standard application form and separate self-disclosure form.
- Have a process for shortlisting candidates for selection, involving more than one person.
- Have a face-to-face interview or meeting with a panel of more than one person with a transparent scoring system for shortlisting and interviews.
- Obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- Obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- Refer where appropriate to our written policy on the recruitment of ex offenders.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities.
- Verify the person's right to work in the UK.
- If the person has lived or worked outside the UK, make any further checks the organisation considers appropriate.
- Verify professional qualifications, as appropriate.
- Ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State.
- Seek two references, including from the current employer, and ask specific questions about the suitability of the candidate to work with women and young girls.

- Consider conducting online searches on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process.
- Have a probation period for staff and volunteers with a review before they are confirmed in post and regular ongoing performance reviews to check suitability and training requirements.
- Have an induction process for all staff and volunteers and provide regular supervision support and annual appraisal on an ongoing basis.
- Ensure that staff are aware of the Sexual Offences Act 2003 – and that it is an offence for a person over the age of 18 to enter into a sexual relationship, or engage in certain other sexual activities, with a young person (aged under 18) where they knowingly coach, teach, train, supervise or instruct them on a regular basis in a sport or religion setting.

### **Existing staff**

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out. We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

## **Volunteers**

We will never leave an unchecked volunteer to be left unsupervised or to work in regulated activity. We will obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. We will undertake a risk assessment when deciding whether to undertake an enhanced DBS certificate for any volunteer not engaging in regulated activity and retain a record of this risk assessment.

All Directors will have an enhanced DBS check without barred list information. A barred list check will be completed if a director is in regulated activity. Contractors We will ensure that any contractor whose work provides them with the opportunity for contact with the women and young girls will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check including barred list information. For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with women and young girls, an enhanced DBS check will be required. No contractors who have not had checks conducted upon them will be left unaccompanied.

### **Appendix 3 : Statement of procedures for dealing with allegations of abuse against staff and volunteers**

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

- Behaved in a way that has harmed a woman or young person, or may have harmed a child
- Possibly committed a criminal offence against or related to a child, young girl or woman
- Behaved towards a young person or woman in a way that indicates he or she may pose a risk of harm to young people, women or children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations that meet the harm threshold We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent

way that provides effective protection for the women, young people and children and supports the person who is the subject of the allegation. We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation. Allegations of abuse against staff should be reported to the DSL. If the allegation relates to this nominated person, allegations should be shared with the Director of Programmes or Joint CEO. If the member of staff perceives there to be a conflict of interest, they can refer directly to the LADO. The contact details are available in the key contacts.

The DSL will contact the Local Authority Designated Officer (LADO) immediately for advice and if the individual should be suspended. Notification of the suspension and reasons will be conveyed in writing to the individual in accordance with the organisation's procedures. There will be no internal investigation before interaction with the LADO and the organisation will act accordingly on the advice provided.

### **Low-level Concerns**

The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct. Which can be found here. [www.sheechoes.co.uk](http://www.sheechoes.co.uk)

A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to: •
- Being over friendly with children;
- Having favourites;
- Taking photographs of children on a personal mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or

- Humiliating pupils. Such behaviour can exist on a spectrum. Our organisations' response to low-level concerns is an extension of our Code of Conduct. Staff are able to share their concerns confidentially in a simple and easy manner. It is imperative that where staff do have concerns, they share them as outlined in this policy to support with building a culture of expected behaviour and promoting our values. Low-level concerns should be reported to the DSL

The DSL will have oversight of all recorded concerns and has ultimate decisionmaking power in respect of all low-level concerns. Any concerns about the DSL should be reported to the CEO.

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual who raised the concern should be noticed, but if the individual wishes to remain anonymous, that will be respected to the extent it is reasonably possible to do so. Records will be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold. We will also consider whether there are wider cultural issues existing within the organisation that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver extra training where we consider this will minimise the events happening again.

Learning lessons At the conclusion of a case in which an allegation is substantiated, we will review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the organisation's procedures or practice to help prevent similar events in the future. Non-recent allegations of abuse can be reported no matter how long ago it happened. When an adult makes an allegation to our school that they were abused as a young person, the individual will be advised to report the allegation

to the police. We will report any non-recent allegations made by a woman or young person to the LADO.

This policy follows guidance as outlined by: References to other policies/ procedures

- Complaints procedure,
- Information sharing arrangements,
- Whistleblowing policy
- Behaviour policy (code of conduct),
- Working together to Safeguard Children (2023),
- Health and Safety Policy
- Recruitment of ex-offenders Policy,
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (2012)
- Sexual Offences Act (2003)
- Domestic Abuse Act (2021)
- Serious Crime Act (2015) (FGM)
- Modern Slavery Act (2015)
- Counter Terrorism and Security Act (2015)
- Equality Act (2010)
- Human Rights Act (1998)
- Southwark Safeguarding Children Partnership Procedures

**Anti-bullying policy, Local services and early help available:**

- [Kooth](#) -anonymous online counselling and support for young people
- [UK Safer Internet Centre](#) - resources for parents
- [Citizens Advice Service](#) - advice on protecting children
- [Mencap](#) - advice around safeguarding adults

**This policy is based on guidance from:**

[Violence against women and girls](#)

<https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees>

[After school clubs, community activities, and tuition - safeguarding guidance](#)

[Working together to safeguard children, 2023](#)

[Safeguarding Standards and Guidance](#)